

)	
)	
In the Matter of)	
)	
The State of Mobile Wireless)	WT Docket No. 11-186
)	
Competition)	
)	
)	
)	

Christopher E. Wilson
Director and Counsel, E-Commerce and Telecommunications
TECHAMERICA
601 Pennsylvania Ave, NW
North Building, Suite 600
Washington, D.C. 20004
(202) 682-4451

November 23, 2011

TechAmerica hereby submits these comments in response to the Federal Communications Commission's ("Commission's") Public Notice addressing the state of mobile wireless competition.¹ TechAmerica's members include facilities-based wireless service providers, wireless infrastructure providers, and a variety of other companies, such as chip makers and mobile device manufacturers, who depend upon a robust wireless ecosystem. TechAmerica is pleased to be able to file comments on their behalf in this proceeding.

Introduction

TechAmerica believes that the current state of the mobile wireless market is highly competitive. Buoyed by the deployment of 4G networks, which continue to be rolled out as quickly as possible, the mobile wireless market is as robust as ever. Additionally, the proliferation of "smart" mobile devices, including phones and tablets, have spurred consumers' embrace of wireless networking and technology.

Nevertheless, the mobile wireless market's future could be even brighter than it is now if the Commission acts to ensure that there is enough spectrum available to meet consumer demand and that there are fewer hindrances to the deployment of wireless network infrastructure.

More Spectrum Needed

The Commission inquires as to the extent of the need for additional spectrum to deploy advanced mobile broadband networks.² TechAmerica appreciates the Commission's request for comment on this matter. As Commission Chairman

¹Wireless Telecommunications Bureau Seeks Comment on the State of Mobile Wireless Competition, Public Notice, WT Docket No. 11-186 (Nov. 3, 2011) ("Public Notice").

² Public Notice at 13.

Genachowski has noted, demand for spectrum is “rapidly outstripping supply.”³

TechAmerica agrees with the Chairman and believes that technological innovation in the wireless ecosystem requires the increased availability and efficient use of spectrum.

In this regard, TechAmerica welcomes the repurposing of broadcast spectrum for mobile broadband use via Congressionally-authorized voluntary spectrum auctions that are flexible and transparent. The insertion into the wireless market of repurposed broadcast spectrum will undoubtedly spur further innovation and will help meet consumers’ insatiable demand for mobile wireless access.

Of course, such auctions will take time and significant effort. In the meantime, the Commission should continue to collaborate with the National Telecommunications and Information Administration (“NTIA”) in supporting the efficient use of spectrum by federal and non-federal users so underutilized spectrum is fully utilized. Commercial spectrum licensees should work with government to ensure that additional spectrum is made available in a timely manner while taking into consideration interference and security concerns.

Finally, the Commission should continue its efforts to facilitate innovative spectrum access models and spectrum sharing technologies in order to fully utilize licensed and unlicensed spectrum.⁴

³ FCC Chairman Julius Genachowski, Remarks on Spectrum, April 6, 2011, *available at* http://hraunfoss.fcc.gov/edocs_public/attachmatch/DOC-305593A1.pdf.

⁴ See e.g., *Promoting Expanded Opportunities for Radio Experimentation and Market Trials under Part 5 of the Commission’s Rules and Streamlining Other Related Rules*, Notice of Proposed Rulemaking, FCC 10-197 (Nov. 30, 2010). See also TechAmerica’ comments in this regard, *available at* <http://fjallfoss.fcc.gov/ecfs/document/view?id=7021034057>.

Infrastructure Barriers to Deployment

The Commission further requests comment as to what extent do regulatory and zoning approvals from state and local government authorities act as barriers to network deployments.⁵ TechAmerica welcomes the opportunity to respond and appreciates the Commission's interest in the matter.

Significant progress in accelerating the deployment of broadband and next generation wireless services can be achieved through streamlining the redundant zoning re-review that wireless providers must endure to simply attach additional antennas or swap antennas on wireless infrastructure that has already passed an extensive local zoning and permitting process.

Wireless infrastructure enables the use of the spectrum to provide the vital link between the user and the network. The deployment of wireless facilities on existing infrastructure not only improves the efficient use of limited spectrum resources, but also allows for more rapid deployment of next-generation technologies and greater opportunities for new innovations and competition.

As consumer demand for wireless services continues to grow, wireless infrastructure must be strategically located to ensure ubiquitous consumer access. Infrastructure is the backbone for that access. Collocating additional antennas to existing support structures or simply swapping last generation antennas and equipment for those that provide advanced wireless services is the most efficient, cost-effective, and quickest method of building out nationwide wireless networks. The existing

⁵ Public Notice at 14.

infrastructure that supports current wireless networks can also be used to support next-generation wireless networks.

Given that the placement and operating parameters of existing towers have already been approved through the local zoning process, the placement of antennas and equipment consistent with that approval should be an efficient process. Yet across the country, attempts to deploy services through collocation on existing structures are often subject to extensive delays. These delays – which can be 18 months or longer – occur despite the fact that the land use decision has already been made and the tower is already permitted and operational.

To the extent practicable, the Commission, perhaps in concert with Congress, should assist in streamlining the collocation and modification review process in order to fully enable the deployment of next-generation mobile wireless networks.

Conclusion

TechAmerica believes that the mobile wireless marketplace is highly competitive. Notwithstanding that, competition can thrive further with an infusion of spectrum into the market coupled with certain streamlined zoning procedures that facilitate infrastructure deployment.